

EXHIBIT

TBF 292

BECHTEL & COLE
CHARTERED
ATTORNEYS AT LAW
SUITE 250
1901 L STREET, N.W.
WASHINGTON, D.C. 20036
TELEPHONE (202) 833-4190

GENE A. BECHTEL

TELECOPIER
(202) 833-3084

March 28, 1994
Via Hand Delivery

To: Nathaniel E. Emmons
Howard A. Topel
Christopher A. Holt
Andrew H. Weissman


James Shook
Gary Schonman

All Esquires

From: Gene Bechtel

With regard to discovery under the Red Lion assignment issues in the Glendale-Trinity proceeding, I am enclosing a set of the relevant invoices from Cohen & Berfield to which we have appended pertinent copies of time record sheets for Messrs. Boyce and Schauble, all as previously supplied to you. As indicated at last Friday's deposition session, we have furnished all time records that have been found relative to these invoices. We then agreed to identify items on the invoices involving the time of Messrs. Boyce and Schauble for which no time records have been found. Those are:

1. Last item of legal service listed on invoice dated November 9, 1990.
2. First item of legal service listed on invoice dated May 6, 1991.
3. First item of legal service listed on invoice dated June 5, 1991.


cc (text only, via regular mail) to Colby May, Esq. and David Honig, Esq.

Federal Communications Commission

Docket No. 93-75 Exhibit No. 292

Presented by TRINITY

Disposition { Identified ✓ 5/3/94
Received ✓ 5/3/94
Rejected _____

Reporter M. K. FLEISHMAN

Date 5/3/94

R-6-15

LAW OFFICES

COHEN AND BERFIELD, P.C.

BOARD OF TRADE BUILDING

1129 20TH STREET, N.W.

WASHINGTON, D.C. 20036

(202) 466-8565

TELECOPIER

(202) 785-0934

LEWIS I. COHEN
MORTON L. BERFIELD
ROY W. BOYCE
JOHN J. SCHAUBLE*
*VIRGINIA BAR ONLY

March 13, 1989

Raystay Company
c/o Mr. David Gardner
c/o Waymaker Company
1416 Trindle Road
Carlisle, PA 17013

For Professional Services

Coordination with David Gardner and Robert
Hoover regarding low power channel possibilities;

Coordination with Greg Daly as to transmitter site
arrangements;

Preparation and filing of five low power applications
for Red Lion, Lancaster, and Lebanon, PA.

\$ 5,200.00

Disbursements

Postage, telephone and reproduction \$22.03

CUMULATIVE TOTAL DUE \$ 5,222.03

No time records

(2)

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April 4, 1990

Raystay Company
c/o Mr. George Gardner
P.O. Box 38
Carlisle, PA 17013

RE: Adwave Company

For Professional Services

Telephone conferences with Mr.
Gardner and character witnesses
regarding preparation of Declar-
ations to satisfy Commission's
Order;

Preparation of Mr. Gardner's
Declaration and Character
Declarations of Robert W.
Chilton, Gilmore B. Seavers, Rev.
Andrew J. Fontanella, Stanley T.
Singer and Lincoln A. Warrell;

Preparation and filing on March 14,
1990 of Amendments to 5 LPTV
applications;

TOTAL \$ 4,000.00

Disbursements

Postage, telephone and reproduction \$ 84.90
(November 1989 thru March 1990)

CUMULATIVE TOTAL DUE \$ 4,084.90

No time records

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May 1, 1990

Raystay Company
c/o Mr. George Gardner
P.O. Box 38
Carlisle, PA 17013

RE: Adwave Company

For Professional Services

Balance due from statement
dated April 4, 1990 \$ 4,084.90

Disbursements

Postage, telephone and reproduction
(April, 1990) \$ 21.24

CUMULATIVE TOTAL DUE \$ 4,106.14

No time records

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LEWIS I. COHEN
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June 4, 1990

Raystay Company
c/o Mr. George Gardner
P.O. Box 38
Carlisle, PA 17013

RE: Adwave Company

For Professional Services

Preparation of Mr. Gardner's
Supplemental Declaration dated May 7;

Telephone and personal conferences
with FCC staff members regarding Mr.
Gardner's Declaration;

TOTAL \$ 1,500.00

Disbursements

Postage, telephone and reproduction \$ 7.76

Balance due from statement
dated April 4, 1990

\$ 4,106.14

6/5/90
CK 238

CUMULATIVE TOTAL DUE

\$ 5,613.90

1507.76

6/6/90
CK 634

No time records

5

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JOHN J. SCHAUBLE*

*VIRGINIA BAR ONLY

June 4, 1990

Raystay Company
c/o Mr. David Gardner
P.O. Box 38
Carlisle, PA 17013

For Professional Services

Preparation of memorandum dated May 8
concerning compliance with LPTV rules;

Review of documents sent by Ms. Bishop
concerning the Dillsburg LPTV station;

Filing of LPTV network affiliation
agreements with the Commission;

Discussions with Commission staff and
Ms. Bishop concerning LPTV station
records;

Preparation of letter to Ms. Bishop
dated May 16 concerning station records;

Filing EEO reports for Raystay and GH
Cable systems on May 4, 1990;

Preparation of letter to Richard
Forsyth of April 11, 1990 re aero-
nautical notices and filing on May 18,
1990 of three aeronautical notices;

Research at FCC re GH Cable Arizona
communities, notification of change of
ownership with respect thereto filed
May 23, 1990 and letter of May 23,
1990 with respect thereto;

Total

\$ 3,200.00

6

Disbursements

Postage, telephone and reproduction

112.39

CUMULATIVE TOTAL DUE

\$ 3,312.39

Pd 6/26/90
CK 634

JOHN SCHAUBLE - BILLING - MAY 1990

Raystay	5/2 - Researched LPTV rules; gave material to LIE	45 min
Company	5/4 - Drafted memorandum re LPTV compliance procedures 2 hrs. 30 min.	
	5/7 - Revised LPTV memo - not discussed it w/ LIE	15 min
	5/8 - Finished LPTV memo	15 min
	5/14 - Reviewed documents sent by Ms. Bishop	15 min
	5/15 - Prepared network affiliation agreements for filing w/ FCC	
	Discussed community ^{station} records rule with FCC staff	
	& Ms. Bishop - wrote letter to Ms. Bishop	1 hr. 30 min
	5/16 - Filed affiliation agreements	
	Finished letter to Ms. Bishop	15 min
		TOTAL 5 hrs. 45 min

GF-8
1

~~BU~~ BU YCE

MAY 1990

[Faint, illegible handwritten text]

Raystay

filing EEO reports for Raystay and
G4 Cable systems on May 4, 1990

 $\frac{1}{2}$

preparation of letter to Richard

Forsyth of letter of April 11, 1990

re aeronautical notices and filing
on May 18, 1990 of three aeronautical
notices

 $4\frac{1}{2}$

research at FCC re G4 Cable Arizona

communities, notification of change

of ownership with respect thereto

filed May 23, 1990 and letter of

May 23, 1990 with respect thereto

3

LAW OFFICES

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LEWIS I. COHEN
MORTON L. BERFIELD
ROY W. BOYCE
JOHN J. SCHAUBLE*

*VIRGINIA BAR ONLY

August 7, 1990

Raystay Company
c/o Mr. David Gardner
P.O. Box 38
Carlisle, PA 17013

For Professional Services

Review and filing of Metal
Township registration statement
on June 28, 1990;

Conferences with FCC staff
members regarding grant of
applications for 5 low power
television stations and
obtaining construction permits;

Total \$ 1,300.00

Disbursements

Postage, telephone and reproduction	28.59
Filing Fee to FCC (Metal Twp)	
Registration Statement	35.00

CUMULATIVE TOTAL DUE \$ 1,363.59

Boyle
July - PD

GF-8
2

Raystay

1

review and filing of Metal Twp.
registration statement on July , 1990

$\frac{1}{2}$

14

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November 9, 1990

Raystay Company
c/c Mr. George Gardner
P.O. Box 38
Carlisle, PA 17013

For Professional Services

Preparation of letter dated
August 8 concerning compliance
program for LPTV stations;

Discussions with Mr. Mosebach
and other station personnel
concerning compliance of
Dillsburg station with LPTV rules;

Review of documents, Commission
records and rules re compliance
of Dillsburg station with LPTV
rules;

Preparation of certification of
compliance with Commission rules
dated November 9;

Total \$ 1,500.00

Disbursements

Postage, telephone and reproduction 34.29
(August thru October, 1990)

CUMULATIVE TOTAL DUE \$ 1,534.29

JOHN SCHAUBLE - BILLING - AUGUST 1990

Raystay
company

Discussions with Mr. Maselbach and preparation of
letter dated August 8 re LPTV compliance
program.

TOTAL Ltrs 25 mins

JOHN SCHAUBLE - BILLING - SEPTEMBER 1990

Raystay... Review of files concerning compliance of Dillstrom
Company station, discussion with Mr. Morehead re same.

TOTAL 1 hr. 45 min.

JOHN SCHAUBLE - BILLING - OCTOBER 1990

21

Raystay 10/24- Prepared project status request & sent to FAA

15 mins.

10/30- Discussed LPTV certification w/ Mr. Mezbach

15 mins.

TOTAL 30 mins

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TELECOPIER
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May 6, 1991

Raystay Company
c/o Mr. Lee H. Sandifer
P.O. Box 38
Carlisle, PA 17013

For Professional Services

Preparation and filing on
April 19, 1991 of letter
concerning incorrect license
name on West Virginia CARS
license;

Coordination and filing on
April 22, 1991 of renewal
application for Business
Radio Station WNEN-512;

Review of low power agreements,
Research and discussion with
Mr. Sandifer, and letter of
April 24, 1991;

Total \$ 750.00

Disbursements

Postage, telephone and reproduction 16.62
Pittsburgh filing delivery fee 20.00

Total \$ 786.62

Balance due per statement dated
April 5, 1991

\$ ~~1,257.35~~

CUMULATIVE TOTAL DUE

\$ ~~2,043.97~~

786.62

26 5/11/91 c/c 11/21
22

JOHN SCHAUBLE - BILLING - APRIL 1991

Raystay Review of and research re proposed contract

Co. between Raystay and ~~Ray~~ Alternatives Virginia

re LP IV stations

2 hrs. 15 mins.

Filing on April 22 of renewal application for
microwave station

15 mins

TOTAL 2 hrs. 30 mins.